

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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**ESTATE OF CHRISTOPHER J. DAVIS**, and  
**DORETHA LOCK**, as the Special Administrator of  
The Estate of Christopher J. Davis,

Plaintiffs,

v.

Case No.18-CV-01846

**JUAN ORITZ, WALWORTH COUNTY**, a municipal  
corporation, **KURT PICKNELL**,  
**TOWN OF EAST TROY**, a municipal corporation,  
**VILLAGE OF EAST TROY**, a municipal corporation,  
**JAMES R. SURGES, ALAN BOYES**,  
**JEREMY SWENDROWSKI, MATTHEW WEBER**,  
**PAUL SCHMIDT, CRAIG KNOX, JEFF PRICE**,  
**AARON HACKETT, JOSE G. LARA**,  
**ROBERTO JUAREZ NIEVES, JR.**,  
**WISCONSIN MUNICIPAL MUTUAL INSURANCE COMPANY**,  
**EMPLOYERS MUTUAL CASUALTY COMPANY**, and  
**AMERICAN ALTERNATIVE INSURANCE CORPORATION**,

Defendants.

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**DEFENDANTS TOWN OF EAST TROY, (retired) CHIEF OF POLICE JAMES  
SURGES, OFFICER CRAIG KNOX, SGT. PAUL SCHMIDT & AMERICAN  
ALTERNATIVE INSURANCE CORPORATION 'S BRIEF IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT**

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NOW COMES Defendants, Town of East Troy, (retired) Chief of Police James Surges,  
Officer Craig Knox, Sergeant Paul Schmidt and American Alternative Insurance Corporation  
(hereinafter "Town defendants", "Town of East Troy Police Department" or "TETPD"), by and  
through their attorneys, Thompson Legal, LLC, and The MacMain Law Group, LLC, and hereby  
move the Court, the Honorable J.P. Stadtmueller presiding, for an order granting summary  
judgment in their favor pursuant to Rule 56 of the Federal Rules of Civil Procedure.

The grounds for this Motion are as set forth in the record, Defendants' Brief in Support of their Motion for Summary Judgment, Defendants' Proposed Findings of Fact in Support of their Motion for Summary Judgment, and the supporting affidavits filed herein.

Respectfully submitted this 15<sup>th</sup> day of August, 2019.

**THOMPSON LEGAL, LLC**

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**THE MACMAIN LAW GROUP, LLC**

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